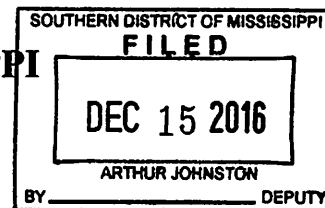


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**



DOUGLAS HANDSHOE

v.

CIVIL ACTION NO. 1:15cv382-HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A/ TROUT
POINT LODGE LTD OF NOVA SCOTIA
& IN THEIR INDIVIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS & ASHOKA

MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

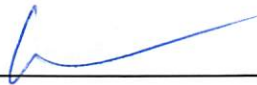
NOW into court comes Plaintiff Douglas Handshoe, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, for leave to file a Third Amended Complaint in this matter, a copy of which is attached to the accompanying Memorandum of law in Support. The Third Amended Complaint repleads in a more complete form the counts and allegations against the defendants and eliminates the common law torts which Plaintiff now concedes are preempted under the Copyright Act. The Third Amended complaint adds an additional Declaratory Count for Copyright Misuse.

Plaintiff has conferred with opposing counsel, who did not agree in writing to allow the filing of this Third Amended Complaint.

These matters are discussed more fully in the accompanying Memorandum of Law in support thereof.

WHEREFORE, Plaintiff prays the Court grants this Motion for Leave to File a Third Amended Complaint in this matter.

Respectfully submitted this 15th day of December, 2016,




Douglas Handshoe, Plaintiff
Post Office Box 788
110 Hall Street
Wiggins, MS 39577
(228) 284-0004
earning04@gmail.com

CERTIFICATE OF SERVICE

I, Douglas Handshoe, hereby certify that on December 15, 2016 the foregoing was sent for electronically filing by me via the Clerk of the Court using the ECF system which sent notification to all counsel of record upon filing by the Clerk.

Respectfully submitted this 15th day of December, 2016,



Douglas Handshoe
Post Office Box 788
110 Hall Street
Wiggins, MS 39577
(601) 928-5380
earning04@gmail.com